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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JUDD ELIASOPH, on behalf of himself and all
others similarly situated,

Plaintiff,

vs.

LG PHILIPS LCD CO., LTD., et al,

Defendants.

Case No. C06-7588 SI

**STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME TO
RESPOND TO COMPLAINT AND
COMPLAINTS IN RELATED ACTIONS**

Judge: Hon. Susan Illston

THIS DOCUMENT ALSO RELATES TO:

Sorokin v. LG Phillips LCD Co. Ltd., et al,
N.D. Cal. Case No. C-06-07600 SI

Nash v. LG Phillips LCD Co. Ltd., et al,
N.D. Cal. Case No. C-06-07601 SI

Forlan v. LG Phillips LCD Co. Ltd., et al,
N.D. Cal. Case No. C-06-07602 SI

Henderson v. LG Phillips LCD Co. Ltd., et al,
N.D. Cal. Case No. C-06-07609 SI

Maites v. LG Phillips LCD Co. Ltd., et al,
N.D. Cal. Case No. C-06-07638 SI

Truong v. LG Phillips LCD Co. Ltd., et al,
N.D. Cal. Case No. C-06-07639 SI

Truong v. LG Phillips LCD Co. Ltd., et al,
N.D. Cal. Case No. C-06-07640 SI

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STIPULATION AND [PROPOSED] ORDER EXTENDING TIME TO
RESPOND TO COMPLAINT AND COMPLAINTS IN RELATED ACTIONS

1 *Kerson v. LG Phillips LCD Co. Ltd., et al,*
2 N.D. Cal. Case No. C-06-07678 SI

3 *Brock v. LG Phillips LCD Co. Ltd., et al,*
4 N.D. Cal. Case No. C-06-07679 SI

5 *Rozo v. LG Phillips LCD Co. Ltd., et al,*
6 N.D. Cal. Case No. C-06-07693 SI

7 WHEREAS the undersigned plaintiffs have filed the above-captioned eleven cases;
8 WHEREAS plaintiffs allege antitrust violations by manufacturers of Liquid Crystal
9 Display (“LCD”) products;

10 WHEREAS on January 8, 2007, this Court entered a Related Case Order finding
11 that these eleven LCD Cases pending in the Northern District of California are related cases;

12 WHEREAS at least forty complaints have been filed to date in federal district
13 courts throughout the United States by plaintiffs purporting to bring class actions on behalf of
14 direct and indirect purchasers alleging antitrust violations by manufacturers of LCD products
15 (collectively, “the LCD Cases”);

16 WHEREAS there are motions pending before the Judicial Panel on Multidistrict
17 Litigation (“JPML”) to transfer the LCD Cases to the Northern District of California and the
18 District of New Jersey for consolidated pretrial proceedings pursuant to 28 U.S.C. § 1407;

19 WHEREAS plaintiffs anticipate the possibility of Consolidated Amended
20 Complaints in the direct and indirect LCD Cases;

21 WHEREAS plaintiffs and Samsung Semiconductor, Inc. (“SSI”) have agreed that
22 an orderly schedule for any response to the pleadings in the LCD Cases would be more efficient
23 for the parties and for the Court;

24 WHEREAS plaintiffs agree that the deadline for SSI to respond to the Complaints
25 in the above-captioned cases and any other cases subsequently transferred to this Court by way of
26 an order pursuant to the supplemental January 12, 2007 administrative motion to relate cases, or
27 any subsequent order, shall be extended until the earlier of the following two dates: (1) forty-five
28 days after the filing of Consolidated Amended Complaint(s) in the transferee court in which the

1 LCD Cases are consolidated by the JPML; or (2) forty-five days after plaintiffs provide written
2 notice to SSI that they do not intend to file a Consolidated Amended Complaint, provided that
3 such notice may be given only after the initial case management conference in the MDL transferee
4 court in this case;

5 WHEREAS plaintiffs further agree that this extension is available, without further
6 stipulation with counsel for plaintiffs to all named defendants who notify plaintiffs in writing of
7 their intention to join this extension;

8 WHEREAS this Stipulation does not constitute a waiver by SSI or any defendant of
9 any other defense, including but not limited to the defenses of lack of personal or subject matter
10 jurisdiction, insufficiency of process, insufficiency of service of process, or improper venue;

11 WHEREAS SSI (and any other named defendant who provides notice of its
12 intention to join this extension provided by this Stipulation) agrees that, notwithstanding the other
13 terms of this Stipulation, should it respond to any complaint in another LCD case filed in another
14 United States District Court prior to the date contemplated by this Stipulation (except pursuant to
15 Court Order), then it shall make a simultaneous response to the complaint in the above-captioned
16 matter.

17
18 PLAINTIFFS AND DEFENDANT SSI, BY AND THROUGH THEIR RESPECTIVE
19 COUNSEL OF RECORD, HEREBY STIPULATE AND AGREE AS FOLLOWS:

20 1. The deadline for SSI to respond to any Complaint in the above-captioned
21 cases and any other cases subsequently transferred to this Court by way of an order pursuant to the
22 supplemental January 12, 2007 administrative motion to relate cases, or any subsequent order,
23 shall be extended until the earlier of the following two dates: (1) forty-five days after the filing of
24 Consolidated Amended Complaint(s) in the transferee court in which the LCD Cases are
25 consolidated by the JPML; or (2) forty-five days after plaintiffs provide written notice to SSI that
26 they do not intend to file a Consolidated Amended Complaint, provided that such notice may be
27 given only after the initial case management conference in the MDL transferee court in this case.

2. This extension is available, without further stipulation with counsel for plaintiffs or further order of the Court, to all named defendants who notify plaintiff in writing of their intention to join this extension.

3. This Stipulation does not constitute a waiver by SSI or any defendant of any other defense, including but not limited to the defenses of lack of personal or subject matter jurisdiction, insufficiency of process, insufficiency of service of process, or improper venue.

4. Notwithstanding the other terms of this Stipulation, should SSI (and any other named defendant who provides notice of its intention to join this extension provided by this Stipulation) respond to any complaint in another LCD case filed in another United States District Court prior to the date contemplated by this Stipulation (except pursuant to Court Order), then it shall make a simultaneous response to the complaint in the above-captioned matter.

IT IS SO STIPULATED.

Dated: January 19, 2007

FURTH LEHMANN & GRANT

By: /s/ Christopher L. Lebsock
Christopher L. Lebsock
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Attorneys for Plaintiff Karen Brock

Dated: January 19, 2007

SHEPPARD, MULLIN, RICHTER &
HAMPTON, LLP

By: /s/ Michael W. Scarborough
Michael W. Scarborough
*Attorneys for Defendant Samsung
Semiconductor, Inc.*

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

IT IS FURTHER ORDERED THAT, to conserve party and judicial resources, and in light of the proceedings currently pending before the JPML to consolidate and transfer all pending LCD Cases to one Court, this extension is available in all related actions (both current actions and those to be related in the future) to any defendant that provides written notice to plaintiff's counsel in such action of this Order and its intention to join this extension, without further stipulation with counsel for plaintiff(s) in the related actions.

Dated: _____



Honorable Susan Illston
Judge of the United States District Court

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PROOF OF SERVICE

I, Robert L. Newman, declare under penalty of perjury that the following is true and correct:

I am a citizen of the United States; am over the age of 18 years; am employed by FURTH LEHMANN & GRANT LLP, located at 225 Bush Street, 15th Floor, San Francisco, California 94104, whose members are members of the State Bar of California and at least one of whose members is a member of the Bar of each Federal District Court within California; am not a party to the within action; and that I caused to be served a true and correct copy of the following documents in the manner indicated below:

1. STIPULATION AND [PROPOSED] ORDER EXTENDING TIME TO RESPOND TO COMPLAINT AND COMPLAINTS IN RELATED ACTIONS; and
2. PROOF OF SERVICE.



By Electronic Filing: I served a true copy on this date of each document listed above via the Court's ECF system on all parties registered for electronic filing in this action.



By Mail: I placed a true copy on this date of each document listed above in a sealed envelope addressed to each person listed on the attached service list. I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice, it would be deposited with the U.S. Postal Service on the same day with postage thereon fully prepaid in the ordinary course of business. I am aware that upon motion of a party served, service is presumed invalid if the postal cancellation date or postage meter date is more than one day after date of deposit for mailing in the affidavit.

SERVICE LIST

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Executed on January 22, 2007 at San Francisco, California.

Signed /s/ Robert L. Newman